

Docket No: 1:19-cv-00593 (LCB)(JLW)

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA

-----X
ZION WILLIAMSON,

Plaintiff,

-against-

PRIME SPORTS MARKETING, LLC AND
GINA FORD,

Defendants.

-----X

NOTICE OF MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT

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***ATTORNEYS FOR DEFENDANTS PRIME SPORTS MARKETING, LLC
AND GINA FORD***

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA

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ZION WILLIAMSON,

Plaintiff,

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NOTICE OF MOTION

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PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Declaration of Willie E. Gary, Esq. dated September 12, 2019 and the Exhibits attached thereto, the Affidavit of Defendant GINA FORD dated and duly sworn to on September 11, 2019, and, all pleadings and proceedings heretofore had herein, Defendants PRIME SPORTS MARKETING, LLC and GINA FORD will move this Court before the Honorable Loretta Copeland Biggs on a date to be determined by the Court at the United States District Court, Middle District of North Carolina, for an Order dismissing Plaintiff's First Amended Complaint in this action for lack of jurisdiction and lack of diversity of citizenship jurisdiction in violation of 28 U.S. Code Section 1332(a), for failure to join a necessary party and for *forum non conveniens*, pursuant to FRCP 12(b), 12(b)(1), 12(b)(6), 12(b)(7) and FRCP 19.

Dated: Jamaica, New York
September 12, 2019

Respectfully submitted,

By: /s/ Willie E. Gary
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By: /s/ Alvin L. Pittman
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